

Analysis of the DC Comprehensive Plan: The Kind of Plan That the District Has

Background on the DC Comprehensive Plan:

Throughout the United States, comprehensive plans have been, for over seventy years, the legally-mandated tool used by cities to guide their future development or redevelopment. Because of its unique role as the nation's capital, the comprehensive plan for DC is comprised of two components: the Federal Elements, which address - Federal lands and facilities, and the District Elements, which addressing all other lands and local municipal functions. Together, they constitute the city's mandated planning documents. The Federal Elements are prepared and adopted by the National Capital Planning Commission (NCPC). The District Elements are prepared by the Mayor through the Office of Planning (incorporating proposed amendments from the community). The Mayor transmits the proposed amendments to the Council, which can alter, remove or add amendments, and then adopts the amendments, subject to approval by the Mayor, NCPC review for federal interest and Congressional review.

The District Elements are divided into two parts: general elements that apply citywide and a ward plan for each of the city's eight wards. The ward plans cover the same ten key issue areas as the general document, but relate more specifically to local issues. In addition, small area plans are to be prepared and adopted by resolution of the Council. Small area plans are the third tier of the District's planning structure and are intended to provide supplemental guidance to the Zoning Commission and other District agencies in carrying out the policies of the Comprehensive Plan. A small area plan for the Takoma central area was recently completed and approved by the Council. Another small area plan, the Anacostia Development Concept Plan is referenced in the Ward 6 Plan (which is now located in Ward 8 with the redistricting)

Comprehensive plans come in many forms and serve different purposes. The DC Comprehensive Plan is primarily a policy document with a large set of goals, objectives and policies. As such, the plan is much like an agenda or a listing of desired actions. These cover multiple topic areas (called Elements) including, in order of detail and specificity: Downtown, Urban Design, Land Use, Economic Development, Housing, Public Facilities, Preservation, Transportation, Human Services and the Environment.

As with most comprehensive plans, the DC plan is *advisory* in nature; its policies do not override or control other implementation actions directly. Its policies are, however, intended to guide actions by many other agencies and players in the development and redevelopment of the city. Its role and purpose is described in several statutes.

Initial Plan Development:

The current plan was initially developed between 1980 and 1985, building on some earlier work. Its major themes stress neighborhood stability and investment, increasing employment opportunities, downtown revitalization, preservation of cultural amenities, physical improvements, community outreach, strengthening of the City's regional hub role and providing for diversity and "social responsibilities." Since 1984-5, when the Plan was adopted, the Plan has been added to and amended three times (1989, 1994 and 1998) but its basic structure, approach and policies have remained unchanged.

The Statutory Purposes and Roles of the Plan:

The DC Statutes vest the City's Mayor with the power and authority to initiate, develop and submit the plan to the City Council for adoption. The City Council can and does amend the plan. The Mayor can veto such amendments. The Mayor and his/her staff are also charged with proposing amendments to the plan, mandated by code to occur on a four-year cycle.

The Code (Section 1-301.62) states that "the purposes of the District elements of the Comprehensive Plan for the National Capital are to: (1) Define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development; (2) Guide executive and legislative decisions on matters affecting the District and its citizens; (3) Promote economic growth and jobs for District residents; (4) Guide private and public development in order to achieve District and community goals; (5) Maintain and enhance the natural and architectural assets of the District; and (6) Assist in the conservation, stabilization, and improvement of each neighborhood and community in the District."

The scope of the Plan is fairly broadly defined in the Code. Section 1-244 states that the Comprehensive Plan "may include land use elements, urban renewal and redevelopment elements, a multi-year program of municipal public works for the District, and physical, social, economic, transportation, and population elements." The Code also specifies that the land use element include "a generalized land use map or a series of maps representing the land use policies set forth in the Land Use Element." Under the District's planning acts, the District has established and defined three scales of planning – city-wide, ward-based and small area. The different levels of planning are related to specific official documents.

While the city-wide plan has a 20-year horizon, the Ward Plans have a shorter timeframe. They provide neighborhood level interpretation of the policies outlined in the City-wide Comprehensive Plan and allow the City to focus on specific, short-term issues pertinent to the individual wards. The Ward Plans are

not a substitute for zoning; rather, they serve as guides, particularly in specialized areas, with regard to land use and the intensity of development.

The scope of Small-Area Plans is also described in the Code, Section 1-301.64: "The Mayor shall prepare proposed small area action plans for selected geographical areas that require more specific land use analysis to incorporate the broadest range of planning techniques and solutions practical to achieve the District's goals and objectives. The proposed small area action plans may include specific zoning recommendations, capital improvements requirements, financing strategies, special tax, design, or other regulatory recommendations, and implementation techniques necessary for the realization of objectives and policies of the Comprehensive Plan." The Code goes on to prescribe their process and consistency relationships: "The Mayor shall make copies of each proposed small area action plan available to each affected Advisory Neighborhood Commission and make ample copies of each proposed small area plan available to the Council and the public. Each proposed small area action plan shall include small area maps that depict land use policies at the small area level that are not inconsistent with the adopted generalized District-wide land use maps or approved ward plans."

Implementation of the Comprehensive Plan is intended to occur through agencies implementing programs and plans that further the goals in the Comprehensive Plan, and through necessary map and/or text amendments to ensure "zoning shall not be inconsistent with the Comprehensive Plan". In rezoning cases, the Office of Planning's position is given "great weight" by the Zoning Commission, as it provides technical analysis and policy recommendations. However, as is evident, for example, in the *Tenley*¹ case, the Zoning Commission's actions are not bound by the plan's policies.

Monitoring of Plan implementation occurs through progress reports required by Council. Five such reports were prepared and transmitted completed between 198 and 1994 and another is currently being prepared.

Critique on the Role of the Plan

The two preceding sections have been largely factual and descriptive. This section provides a critique of the Comprehensive Plan. This critique is based on several sources: one-on-one interviews with various stakeholders in the planning process (many of whom are also on the Task Force); focus group discussions with staff members of numerous city agencies; and an analysis by the consultant team. These are presented in the above order. Overlaps and mutually reinforcing themes are evident in these reviews.

¹Tenley and Cleveland Park Emergency Committee et.al., versus D.C. Board of Zoning Adjustment, App. D.C. 550A.2d 331, 1988.

External Stakeholders Interviews Summary

During the Summer of 2002, the DC Office of Planning conducted a series of external stakeholder interviews to learn how the DC Comprehensive Plan is being used in planning, development, and policy decision-making.

Over 20 stakeholders were interviewed, including representatives from ANCs, the Board of Trade, the Federation of Citizen Associations, the Chamber of Commerce, the Consortium of Universities, DC Agenda, George Washington University School's Department of Geography, DC BIA [Builders Industry Association], the local chapter of the American Planning Association, The Washington Regional Network, Washington Area Bicycle Association (WABA), the Sierra Club, the Downtown Business Improvement District, the Committee of 100 on the Federal City, DC Heritage Tourism, a housing not-for profit, Community Partnership (homeless advocacy), D.C. Preservation League (DCPL), the local chapter of the American Institute of Architects, and several land use lawyers.

The interviews highlighted that many external stakeholders are not using the Comprehensive Plan for guidance as they conduct their work. Those that were able to discuss how the plan is being used – either by themselves or others – highlighted that:

- *The plan is primarily used to defend or support development proposals at the block-by-block level.* Neighborhood, special interest, developer and legal interests all shared this finding. One neighborhood group for example, cited that they “used it defensively when development proposals were being considered,” while an institutional stakeholder noted that “we had to defend ourselves against the plan,” when they were trying to get a project built.
- *Only select individuals understand and use the plan.* Several stakeholders shared their concerns that a great divide exists between those who know the plan well and everyone else. One citizen stakeholder shared that “because there is a widespread lack of knowledge, the plan can and has been used against us [citizens].” A business interest group highlighted that “only DC activists and people that are paid to know what’s going on, know the plan.”
- *Some say government is using the plan, others firmly state they are not.* Stakeholders hold different opinions about government’s use of the plan. A few stakeholders cited specific government agencies using the plan, such as the National Capital Planning Commission, the Office of Planning, the Office of Zoning, and the District Department of Transportation. Other stakeholders shared that the District government is failing to use and abide by the plan, creating frustration and disillusionment.

- *Some had difficulty even qualifying it as a plan*, when asked about its use. “Its more a document of opinions”, shared one stakeholder or “a plan with holes that keeping getting filled by lawyers” commented another.
- *When asked who should be using the plan, interviewees shared that a greater number of citizens and interest groups should be using the plan.*
- *Most stakeholders agreed that the plan should be used in making planning policy decisions by government and other stakeholders.* Again, some added that because it is not being used, the power of the plan has been reduced.
- *Elements that have a land use emphasis were cited as being the most useful.* While many stakeholders were not familiar enough with the plan to make any specific references, some highlighted the Land Use Element, Economic Development Element, the Downtown Element, the Design Element, and the Transportation Element.
- *When asked to cite the weaknesses of the plan – stakeholders agreed there are many!* Highlights of the most commonly cited weaknesses are that the plan:
 - *Is too big and too hard to find information.* Many shared that they are unable to find basic information in the document. “It’s too big, it’s hard to make connections with it,” shared one stakeholder.
 - *Is not written well and lacks graphics.* Some stakeholders shared that the document needs to be written in more basic English, rather in legal prose.
 - *Lacks clarity and contains contradictions.* Stakeholders shared that the plan lacks a singular voice or direction, and as such, is being used inconsistently. “For every given block that states it should be a park, another section says it should be densely developed”, shared one stakeholder. “For this reason, I defy the vision that the Comprehensive Plan promotes.” Contradictions are found within the elements and among the Elements. One of the more frequently mentioned contradictions expressed is between the Ward Plans and the general elements. Some found loopholes in the document that allow developers to get around policy intentions.
 - *Is too specific or too broad.* Stakeholders held different opinions about how the level of specificity is contributing to the Plan’s weaknesses. Some shared that the weakness is that the Comprehensive Plan is too specific and has become a de facto zoning document. Others shared that the Plan is too broad on some issues, such as TOD policies, bike and pedestrian transportation, and environmental policies.

Internal Stakeholders - Agency Interviews Summary

During September and October, the consultant team interviewed or conducted focus groups with over 35 senior officials in the administration including department heads, deputy mayors, and senior staff charged with planning responsibilities. A series of themes emerged:

- *Most were unfamiliar with the Comprehensive Plan and some were unaware it existed.* Most officials appointed by Mayor Williams were unfamiliar with Comprehensive Plan since it was last amended just at the end of the prior administration's term (December 1998). Officials who were familiar with the Plan tended to have either facility siting or redevelopment responsibilities or were longtime District employees.
- *Many noted the plan was silent or did not offer adequate direction on issues of high concern to the citizenry and the current Administration.* In reviewing the Plan for the meetings, officials noted issues that were not addressed. These included affordable housing, community-based residential facilities, addressing non-compliance with federal air quality standards, a series of environmental issues (e.g., tree and tree canopy preservation, parking and landscaping issues, reducing stormwater runoff, and a framework for low impact development measures) and a series of transportation issues (e.g., policies on transportation and homeland security issues, transportation safety, traffic calming, curb lane usage in commercial areas, light rail expansion, and parking demand management).
- *Officials echoed other stakeholders in expressing concerns about the Plan's format and construction.* They noted it is too long, poorly formatted, fails to present an integrative framework that ties the elements together, contains contradictions, is much too specific, and fails to articulate a vision for the District of Columbia. Further, it was noted that the Plan fails to articulate the data or source of data for the policies and does not present a rationale or justification for policy recommendations.
- *There was a deep interest in developing coherence among and clear priorities across the District's major planning documents.* Agency officials are often challenged to determine strategic directions for their agency or cluster (groups of agencies directed by a Deputy Mayor) when there are different priorities expressed in major planning documents. Further, many expressed a desire for more attention to long-range planning issues – especially focused on critical issues (e.g., affordable housing public facilities, infrastructure needs, and neighborhood targeting) – to guide near term workplans and budget decisions.
- *The need for coherence among planning documents was particularly noted at the neighborhood level.* Interviewees noted that there are eight Ward Plans, 39 Strategic Neighborhood Action Plans (SNAPs), Strategic Neighborhood

Investment Plans (SNIPs) for targeted areas, Persistent Problem Area Plans, plans for most of the 83 Police Service Area driven by the community policing strategy, various subarea plans (e.g., Anacostia Waterfront Initiative, Takoma Plan), neighborhood elements in the Citywide Strategic Plan, and various neighborhood revitalization plans and the Mayor's Strategic Plan.

- *Officials noted that there are no clear priorities across the plans, requests for funds and resources embedded in these plans significantly exceed current funding levels, and most strategies rely upon the District government rather than articulating collaborative strategies with businesses, community organizations, or the faith community.* Further, there is not an easy way to digest the content of all of the plans and extract the priorities. Officials cautioned against incorporating these plans into the Comprehensive Plan because of the desire to keep the Comprehensive Plan as a high-level policy document. They saw many of the other plans as implementation plans that should be more closely connected to the Comprehensive Plan.

While all of these themes were relatively equally voiced in the conversations, the interviewees expressed an increasing awareness, heightened because of the recent revenue shortfalls, of the need for a integrated public facilities strategy that encompasses District government and DC Public Schools (DCPS). The Comprehensive Plan in its current form does not fulfill this need as it is not coordinated with the City's Capital Improvement Program. DCPS has a recently completed Facilities Master Plan and an ambitious schedule for renovation and rebuilding. The Deputy Mayor for Children, Youth, Families and Elders has expressed interest in placing health and human services facilities in neighborhoods and ensuring each neighborhood has a neighborhood center. Numerous agencies have needs for maintenance and other service facilities as longstanding facilities, such as the Brentwood Impoundment Lot, have been closed. Interviewees expressed the desire for these facilities to be addressed in a more integrated manner.

In the recent effort to close the budget gap, Mayor Williams proposed an effort to consolidate public facilities similar to the effort for military base closing. While this was rejected by Council, the Mayor was urged to develop a proactive public facilities strategy that begins to address these and related issues. Since many of the interviews occurred during the budget negotiations, this issue surfaced frequently.

Consultant Review

The consultant and city staff have developed a framework for reviewing and evaluating the DC Comprehensive Plan. The framework is organized by the following categories:

- Background description
- Description of the plan's development
- Framework of the plan
- Plan content
- Readability and organization of the plan
- Amendment process

Within each of the above categories, the plan is described according to important characteristics or questions and is then evaluated against several further questions or criteria.

The characteristics and questions in this framework amount to a comprehensive description and assessment of the quality of the plan document. The framework is based on work by several researchers (Baer, 1997; Hopkins, 2001), augmented by the consultant team's experience. It is focused on the internal quality of the plan, rather than on its effects and influence, net benefits, or, say, meeting high standards for equity. The stakeholder interviews summarized earlier do address some of these plan attributes, but these larger questions about the plan require a broader framework for evaluation, which is beyond the scope of this particular paper.

The ensuing framework is organized as a table, with the first page providing some basic information on the city. While lengthy and detailed, the tables will provide the reader who is unfamiliar with the plan with a good grasp of the document. Even those familiar with the plan should find this a useful summary and evaluation.